


Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in The U.S.  
DISTRICT COURT at Seattle, Washington.

NOVEMBER 25 2008  
BRUCE RIPKIN, Clerk  
By  Deputy

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

EZEKIEL HAMPTON, and,  
KATRINA GRAUMAN,  
Defendants.

NO. CR08-5671BHS

FIRST SUPERSEDING INDICTMENT



08-CR-05671-INDI

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Engage in Sex Trafficking of a Minor)**

Beginning at a time unknown, but during October 2007 and continuing through  
and including June 24, 2008, at Tacoma, Sea Tac, Lakewood, in the Western District of  
Washington and elsewhere, EZEKIEL HAMPTON, KATRINA GRAUMAN and others  
known and unknown to the grand jury, knowingly did conspire and agree with each other,  
in and affecting interstate commerce, to recruit, entice, harbor, transport, provide, and  
obtain by any means, juvenile females, who were under the age of 18 years old, knowing  
that the juvenile females had not yet attained the age of 18 years old and would be caused  
to engage in a commercial sex act, in violation of Title 18, United States Code, Section  
1591(a)(1) and (b)(2).

1 **A. Object of the Conspiracy**

2 The object of the conspiracy was to make money through the recruitment and  
3 exploitation of adult and juvenile females by having them engage in commercial acts of  
4 prostitution.

5 **B. Manner and Means of the Conspiracy**

6 1. It was part of the conspiracy that EZEKIEL HAMPTON recruited and  
7 solicited, and caused to be recruited and solicited, adult and juvenile females to engage in  
8 commercial sex acts and to assist in the distribution of cocaine and crack cocaine.

9 2. It was further part of the conspiracy that EZEKIEL HAMPTON instructed,  
10 directed, managed, and supervised the prostitution activities of the adult and juvenile  
11 female prostitutes which included providing adult and juvenile female prostitutes a  
12 residence in which to live, advertising the sexual services of the adult and juvenile female  
13 prostitutes on internet sites to include Craigslist, and requiring the adult and juvenile  
14 female prostitutes to give him all proceeds and money made from commercial acts of  
15 prostitution and the sale of illegal drugs.

16 3. It was further part of the conspiracy that EZEKIEL HAMPTON would  
17 threaten or assault the adult and juvenile female prostitutes to ensure compliance with his  
18 rules.

19 4. It was further part of the conspiracy that EZEKIEL HAMPTON exerted  
20 control over the adult and juvenile female prostitutes by using them to package the  
21 cocaine and cocaine base in the form of crack, deliver the drugs to customers, and provide  
22 him with of all of the proceeds from the drug sales.

23 5. It was further part of the conspiracy that EZEKIEL HAMPTON would have  
24 the adult and juvenile prostitutes store his illegal drugs and guns in their purses.

25 6. It was further part of the conspiracy that EZEKIEL HAMPTON used  
26 cellular telephones to contact and monitor the activities of the adult and juvenile female  
27 sex workers regarding their prostitution activities and drug distribution activities.  
28

**C. Overt Acts in Furtherance of the Conspiracy**

During and in furtherance of the conspiracy, one or more of the conspirators, committed one or more of the following overt acts, among other overt acts:

1. During the time period between October 1, 2007 through November 30, 2007, HAMPTON transported JF-1 from Washington State to Portland, Oregon, for her to engage in prostitution.

2. Sometime in December 2007, JF-2 traveled from Tacoma area to the Sea Tac area and met JF-1 and EZEKIEL HAMPTON.

3. Sometime in December 2007, EZEKIEL HAMPTON transported JF-1 and JF-2 to a motel in Sea Tac, Washington.

4. Sometime during December 2007, at Sea Tac, JF-1 and JF-2 engaged in acts of prostitution.

5. Sometime during December 2007, JF-1 and JF-2 gave the proceeds from their prostitution activities to EZEKIEL HAMPTON.

6. Sometime during December 2007, EZEKIEL HAMPTON took digital photographs of JF-2.

7. Sometime during December 2007, EZEKIEL HAMPTON caused JF-2's photograph to be posted on Craig's List.

8. Sometime between December 2007 and February 2008, EZEKIEL HAMPTON assaulted JF-1 because she used cocaine without his permission.

9. Sometime during December 2007 and January 2008, EZEKIEL HAMPTON caused JF-1's photograph to be posted on Craig's List.

10. Some time between December 2007 and January 2008, JF-1 gave EZEKIEL HAMPTON approximately \$50.00 she earned from a commercial sexual act.

11. Sometime between May 1, 2008, through June 20, 2008, EZEKIEL HAMPTON, JF-1, and another female, traveled from Tacoma to Seattle in order for EZEKIEL HAMPTON to sell drugs

All in violation of Title 18, United States Code, Section 371.

**COUNT 2**

**(Interstate Transportation of a Minor in Furtherance of Prostitution)**

On or about October 1, 2007, and continuing through November 30, 2007, within the Western District of Washington, and elsewhere, EZEKIEL HAMPTON did knowingly transport, and aid and abet the transportation of, a juvenile female, JF-1, who was under the age of 18 years, in interstate commerce, from Washington State to Oregon State, with the intent that JF-1 engage in prostitution.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1 above

All in violation of Title 18, United States Code, Sections 2423(a) and 2.

**COUNT 3**

**(Sex Trafficking of a Child)**

At a time period between on or about October 1, 2007, through February 28, 2008, at Sea Tac, Tacoma, and Lakewood, within the Western District of Washington, and elsewhere, EZEKIEL HAMPTON, did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, and obtain by any means, a juvenile female, JF-1, with knowledge that JF-1 had not yet attained the age of 18 years old, and would be caused to engage in a commercial sex act.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1 above,

All in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(2).

**COUNT 4**

**(Sex Trafficking of a Child)**

At a time period between on or about October 1, 2007, through January 31, 2008, at Sea Tac, Tacoma, and Lakewood, within the Western District of Washington, and elsewhere, EZEKIEL HAMPTON, did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, and obtain by any means, a juvenile female,

1 JF-2, with knowledge that JF-2 had not yet attained the age of 18 years old, and would be  
2 caused to engage in a commercial sex act.

3 The Grand Jury further alleges that this offense was committed during and in  
4 furtherance of the conspiracy charged in Count 1 above,

5 All in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(2).

6 **COUNT 5**

7 **(Conspiracy to distribute cocaine and cocaine base in the form of crack)**

8 Beginning at a time unknown but during September 2007, and continuing until on  
9 or about June 24, 2008, EZEKIEL ALON HAMPTON, KATRINA GRAUMAN, and  
10 others known and unknown, knowingly and intentionally did conspire to distribute  
11 cocaine and cocaine base in the form of crack, both substances controlled under Schedule  
12 II of Title 21, United States Code, Section 812.

13 The Grand Jury alleges that this offense involves five (5) grams or more of a  
14 mixture or substance containing cocaine base in the form of crack.

15 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
16 841(b)(1)(B).

17 **COUNT 6**

18 **(Possession with intent to distribute cocaine)**

19 On or about June 24, 2008, at Tacoma, within the Western District of Washington,  
20 EZEKIEL ALON HAMPTON and KATRINA GRAUMAN knowingly and intentionally  
21 possessed, and aided and abetted in the possession of, with the intent to distribute,  
22 cocaine a substance controlled under Schedule II, Title 21, United States Code, Section  
23 812.

24 The Grand Jury further alleges that this offense was done during and in furtherance  
25 of the conspiracy charged in Counts 1 and 4 above.

26 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
27 841(b)(1)(C).  
28

**COUNT 7**

**(Possession with intent to distribute cocaine base in the form of crack)**

On or about June 24, 2008, at Tacoma, within the Western District of Washington, EZEKIEL ALON HAMPTON and KATRINA GRAUMAN knowingly and intentionally possessed, and aided and abetted in the possession of, with the intent to distribute, cocaine base in the form of crack, a substance controlled under Schedule II, Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was done during and in furtherance of the conspiracy charged in Counts 1 and 4 above.

The Grand Jury further alleges that this offense involved in five (5) grams or more of a mixture or substance of cocaine base in the form of crack.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT 8**

**(Possession of a Firearm in furtherance of a drug trafficking offense)**

On or about June 24, 2008, at Tacoma, within the Western District of Washington, EZEKIEL ALON HAMPTON and KATRINA GRAUMAN, did possess, and aid and abet in the possession of, a firearm, to wit: one Browning .25 caliber semiautomatic handgun, in furtherance of a drug trafficking offense, that is, the conspiracy to distribute cocaine and cocaine base in the form of crack cocaine as charged in Count 4 above.

The Grand Jury further alleges that this offense was done during and in furtherance of the conspiracy charged in Counts 1 and 4 above.

All in violation of Title 18, United States Code, Section 924(c).

**COUNT 9**

**(Felon in Possession of a Firearm)**

On or about June 24, 2008, at Tacoma, within the Western District of Washington, EZEKIEL ALON HAMPTON, having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: Assault in the First Degree, in the

King County Superior Court of Washington, cause number 92-1-08027-0 did knowingly possess a firearm that is, one Browning .25 caliber semiautomatic handgun, which has been shipped and transported in interstate commerce.

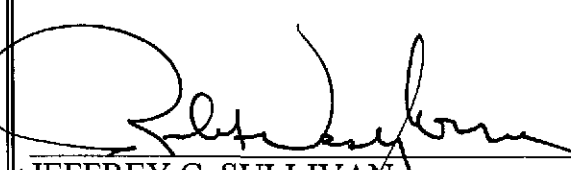
All in violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL:

DATED:

*Signature of the Foreperson redacted  
Pursuant to the policy of the Judicial  
Conference*

FOREPERSON

  
JEFFREY C. SULLIVAN  
United States Attorney

  
TODD GREENBERG  
Assistant United States Attorney

  
BRUCE F. MIYAKE  
Assistant United States Attorney